

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Dragon, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 dbrenner@wrightlegal.net
10 ldragon@wrightlegal.net

11 *Attorneys for Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans*
12 *Servicing, LP*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 BANK OF AMERICA, N.A., AS
16 SUCCESSOR BY MERGER TO BAC HOME
17 LOANS SERVICING, LP,

18 Plaintiff,

19 vs.

20 NORTH AMERICAN TITLE INSURANCE
21 COMPANY, DOE INDIVIDUALS I through
22 X; and ROE CORPORATIONS XI through
23 XX, inclusive,

24 Defendants.

Case No.: 2:21-cv-00415-KJD-VCF

25 **STIPULATION AND ORDER TO**
26 **EXTEND DEADLINE TO FILE A**
27 **~~PROPOSED~~ DISCOVERY PLAN**

(Third Request)

28 Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans Servicing,
LP (“BANA”) and Defendant, North American Title Insurance Company (“NATIC”), by and
through their respective undersigned counsel, hereby stipulate and agree as follows:

This is one of many actions pending before the Nevada state and federal courts involving
a lender’s alleged entitlement to coverage under a title insurance policy following an HOA
foreclosure sale. After the Complaint was filed, BANA and NATIC entered into global settlement
negotiations to discuss the resolution of approximately 100 similar title insurance claims,
including this case. The Parties stipulated to stay this case to achieve that purpose on April 7,
2021. ECF No. 8. On July 6, 2021, the Parties submitted a Joint Status Report [ECF No. 10], and

1 on April 29, 2022, the Court issued a Minute Order requiring that the Parties to file settlement
2 documents, stipulation for dismissal or joint status report within 14 days. ECF No. 11.

3 The Parties submitted a Joint Status Report on November 8, 2022, wherein the Parties
4 advised that the September 29, 2022 mediation was unsuccessful and that the Parties would
5 submit a joint proposed discovery plan by December 8, 2022. ECF No. 14. The deadline was
6 subsequently extended twice and is currently due February 8, 2022. ECF Nos. 20, 22. While the
7 proposed joint discovery plan has been drafted, the Parties need additional time to review and
8 finalize the terms and are requesting an additional seven (7) days to do so, through and including
9 February 15, 2023.

10 Counsel for NATIC does not oppose the request for an extension. This is the third request
11 for an extension which is made in good faith and not for purposes of delay.

12 **IT IS SO STIPULATED.**

13 DATED this 8th day of February, 2023.

DATED 8th day of February, 2023.

14 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

15 /s/ Lindsay D. Dragon, Esq.

/s/ Kevin S. Sinclair, Esq.

16 Lindsay D. Dragon, Esq.

Kevin S. Sinclair, Esq.

17 Nevada Bar No. 13474

Nevada Bar No. 12277

18 7785 W. Sahara Ave., Suite 200

16501 Ventura Blvd, Suite 400

19 Las Vegas, Nevada 89117

Encino, California 91436

20 *Attorneys for Plaintiff, Bank of America,*

Attorneys for Defendant, North American

N.A. as Successor by Merger to BAC Home

Title Insurance Company

Loans Servicing, LP

21
22 **IT IS SO ORDERED.**

23 Dated this 9th day of February, 2023.

24 
25 _____
26 UNITED STATES MAGISTRATE JUDGE
27
28